TSCA INSPECTION

SUMMARY OF OBSERVATIONS

The below listed schools and the LEA'S AHERA Management Plans were inspected on the accompanying dates shortfalls or accomplishments will be shown in each schools paragraph below.

The common violation that occurred at every school was not having a copy of the most recent inspection apparently performed in Dec 2003 thru Jan. 2004. The Philadelphia School District was still in the process of publishing the documents and had not placed any of them in their schools. This was discovered by these 36 inspections plus the district office inspection, and admitted to by the LEA'S representative that it hadn't been placed in any of the schools.

In addition there was no documentation of any training for custodial personnel or school maintenance personnel; on site at the school in all cases. Several of the Building Engineers who were asked about training either claimed to have none or admitted to original training but no refresher. None of them recalled if any of the custodians under them ever had any training.. In an interview with Marijane Hooven designated person for the school district she stated that she did not deal with the awareness training, that that was managed by MR. Timothy McCullough at the District Training Center apparently in the same JFK building Tel. # 875-8452. Several phone calls to him were never returned, therefore unable to set up appointment for interview due to the School Districts Non responsiveness over this matter.

The inspection teams on all the reinspections included a summary of events that happened in each school, however there were no copies of the original paperwork identifying who did the 6 month surveilance or whether the ACBM was seen or touched, how much was involved or exact locations. The same occurred with reponse actions which gave a summary of a removal at the school, but not always how much was removed or the exact location of the abatement. Another problem was identifying the workers none of the schools had a list of workers and their credentials to prove the persons doing the removal were certified. Except for theoriginal and most of the 92 & 94-95 inspections, the later ones did not have copies of the inspector and management planner's credentials, only a statement of who they were and generally their Pa. License number. In the majority of required reponse action summaries the amount and specific location of the material were not given.

AHERA INSPECTION of PHILADELPHIA SCHOOL DISTRICT was performed 3/14/05,3/15/05 and 3/17/05 by Inspector Harry Boyer, assisted by Inspectors Carolyn Bernota and Kyla Townsend-McIntyre. All of the below listed school AHERA files were reviewed at the district Environmental Section, 734 Schuykill Ave, Phila., Pa., 19146. We worked with Michael Cooper during the Inspection. He is a consultant with Synertech Inc..,during discussions with him over the missing documents he introduced us to Kathleen Myers. She was interviewed on 3/15/05 and stated that quarterly she sends each school an update package that has the

paperwork from 6 month surveilances, Response Actions anything concerning Asbestos in the individual school. Also it was pointed out that the 3 Year Inspections are hand delivered and a signed receipt is on file. The district also sends out an annual notification letter to Principals, with instructions to add Asbestos information such as srurveillances, inspections, abatement actions to the letter and post it.

- 1. GIRARD ACADEMIC MUSIC PROGRAM (Grades 5-12)- 22ND & Ritner St. Inspected 8/12/04. Met with Ms. Catherine Muffy, school secretary. School was missing 1994 reinspection, copies of each 6 month surveillance and complete response action reports. There wasn't any Annual Notifications, and Mrs. Muffy stated she was not familiar with this item. No record of Awareness Training.
- 2. CATHERINE ELEMENTARY SCHOOL (K-4), 6600 Chester Ave. Inspected 8/16/04 & 9/8/04. On 8/16/04 met with Principal Ms. Carol White and Building Engineer was on leave, returned to school on 9/8/04 and met with Building Engineer Edward Heinz. Failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 1995 & 1998 Reinspection. No records of Awareness Training according to Mr. Heinz he has been employer by the School District 22 years and originally had 1 week of training, in Asbestos Awareness and the O&M course, but has never had a refresher.
- 3. HAMILTON ELEMENTARY SCHOOL (K-8), 5640 Sprucer St. Inspected 8/17/04 met with Principal Annette Gittleman and Building Engineer Andre Bland, the Principal is aware of the annual notification requirement and sends it out every year. Andre Bland believes he had Awareness Training two years ago. Failed to maintain records of 6 month surveillance, response actions and f1992 3 yr Inspection. No record of 6 mos surveillance in 2000 except for 3 yr inspection, nor 2001, There is not a copy of 2003 reinspection on site
- 4. PEPPER MIDDLE SCHOOL (5-8), 2901 S. 84TH St. Inspected 9/7/04. Met with Building Engineer Fatai Akinwande There was no 2003 inspection at this site. Also school . Failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 1997 Reinspection. No records of Awareness Training according to Mr. Covert he had the 2 hour Awareness Training once, no refresher. No records of any custodians having refresher or original training. No record of 2nd surveillance in 2000 &,2002.
- 5. BRYANT ELEMENTARY SCHOOL (PK-5), 6001 Cedar Ave. Inspected 9/7/04. Met with Building Engineer William Covert. There was no 2003 inspection at this site. Also school. Failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 1997 Reinspection. No records of Awareness Training according to Mr. Covert he had the 2 hour Awareness Training once, no refresher. No records of any custodians having refresher or original training. No record of 2nd surveillance in 2000 &,2002

- 6. MCDANIEL ELEMENTARY SCHOOL (K-4), 2100 Moore St...Inspected 9/7/04. Met with Principal Dr. Brenda P. Wortham & custodial assistant Joan Wright. There was no copy of 2003 inspection at this site. Also school . Failed to maintain records of 6 month surveillance, response actions failed to maintain copies of original AHERA Inspection, 1992, 1995. & 1998 Reinspection. No records of Awareness Training. The only record available was the November 2000 3 year Inspection.
- 7 .MCMICHAEL ELEMENTARY SCHOOL (K-8), 3543 Fairmount Ave. Inspected 9/8/04. Met with Building Engineer Eward Hunley there is no 2003 inspection at this site. School . Failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. .Also missing copies of i992 & 1997 Reinspection. No records of Awareness Training according to Mr. Hunley he had the 2 hour Awareness Tng once, no refresher. No records of any custodians having refresher or original training. No record of 2nd surveillance in 2000, nor any in 1995,1997,&1998.
- 8. .HENRY ELEMENTARY SCHOOL (K-8), 601 Carpenter Lane, inspected 9/27/04. Met with Principal Mrs. Caren M. Trantis. She is new at this school and had gathered all of the documents she could find and tried to maintain them, but there was no copy of 1/5/04 3 Yr inspection at this site. Also school . Failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. .Also missing copies of i992 Reinspection. No records of Awareness Training for maintenance personnel nor records of any custodians having refresher or original training. No record of 2nd surveillance in 2000, or 1995/97/98 response action records were only notifications. Principal stated she does not recall ever sending out annual notifications.
- 9. KELLY ELEMENTARY SCHOOL (K-4), 5116 Pulaski Ave. Inspected 9/27/04 Met with Custodial Assistant Ms. Beverly Banks. There is no copy of the 2003 inspection at this site. Also school . Failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. .Also missing copies of 1992 & 1994 Reinspection. No records of Awareness Training according to Ms. Banks she did not recall any training about Asbestos. her. No records of any custodians having refresher or original training. No record of 2nd surveillance in 2000 or in 1995/97/98..
- 10. . PASTORIUS ELEMENTARY SCHOOL (K-5), 5116 Sprague St. Inspected 9/27/04. Met with Building Engineer Gerald Sweeney there is no copy of 2004 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 1992 & original inspections. No records of Awareness Training . No record of any kind of 6 mos surveillance in 1995 or 2001 in 2000, 2002 & 2003 district only shows one each year, and no copies are at the school.
- 11. LEEDS MIDDLE SCHOOL (6-8), 1100 E Mt. Pleasant Ave. Inspected 9/28/04. Met with Building Engineer Carlton Huffman Jr. there is no copy of 2004 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also no copy of 1992,. No records of Awareness Training. No record of 6 mos surveillance in 1995/97/98 or 2001 in 2000, 2002 district only shows one each year.

- 12. . ROWEN ELEMENTARY SCHOOL (K-5), 6841 N. 19th St. Inspected 9/27/04. Met with Principal Joyce Guy-Patton. There is no copy of 2004 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions (10 day notice only document in file. .Also missing copies of i992 inspection. No records of Awareness Training . No record of any kind of 6 mos surveillance in 1995/97/98//01 in 2000, 2002 district only shows 1 each year.
- 13. . BARRATT MIDDLE SCHOOL (5-8), 1599 Wharton St. Inspected 10/13/04. Met with Building Engineer Amos L. Satchell Jr. there is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. (Satchell hasn't seen a notice in 7 years.). Also missing copies of i992 & 1995 inspections. No records of Awareness Training .(Satchell states he had some asbestos training several years ago, but none since) No record of any kind of 6 mos surveillance in 1995 or 1997/98 ,2001 in 2000, 2002 district only shows one each year, 1..
- 14. . WILLIAM T.TILDEN/EDISON MIDDLE SCHOOL (5-8) 6601 ELMWOOD Ave. Inspected 12/1/04. Met with Building Engineer Ferdinand Stokes. There is no copy of 2004 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of i992 , 1995, 1998 & original inspections. No records of Awareness Training . Neither Stokes or a custodian Mr. Ford recalled any asbestos refresher courses. No record of any kind of 6 mos surveillance in 1995/97/98 or 2001 in 2000, 2002 district only shows one each year,
- 15. . MIDDLE YEAR ALTERNATIVE (5-8) 4901 Chestnut St. Inspected 12/1/04. Met with Building Engineer Johnathon Hayes . There is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. .Also missing copies of i992 , 1995, & original inspections. No records of Awareness Training . There are 6 custodians in Mr. Hayes department and the last training any of them had was 2-3 years ago. No 6 mos surveillance in 1995/97/98 or 2001 in 2000, 2002 district only shows one each year..
- 16. .PARKWAY WEST HIGH SCHOOL.(9-12) 4901 Chestnut St. Inspected 12/1/04. Met with Building Engineer Johnathon Hayes . No copy of 2003 inspection on site. Also school failed to maintain records of 6 month surveillance, response actions, failed to send annual notification. .Also missing copies of 1992 , 1995, & original inspections. No records of Awareness Training . There are 6 custodians in Mr. Hayes department and the last training any of them had was 2-3 years ago. 6 mos surveillance in 1995/97/98 or 2001 in 2000, 2002 district only shows1 each yr.

- 17. BREGY ELEMENTARY SCHOOL (PK-8) 1700 Bigler St. Inspected 12/2/04. Met with Building Engineer James Barrette. There is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 1992, & original inspections. No records of Awareness Training. There are 6 custodians in Mr. Hayes department and the last training any of them had was 2-3 years ago. 6 mos surveillance in 1995/97/98/01 in 2000, 2002 20 district only shows one each year.. Failed to take appropriate response action, TSI 2" & 6" pipe on 3rd scheduled as High Priority Removal In 1994 3 year inspection, still there on 1997 and 2000 3 year inspections, no 2003 available at school or School District Environmental section.
- 18. FELL ELEMENTARY SCHOOL (K-8) 900 Oregon Ave. Inspected 12/2/04. Met with Building Engineer Carmen Salerno . There is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. .Also there are no records of Awareness Training . Mr. Salerno has no recollection of he or the custodians in his department having received an 2 HOUR AWARENESS Refresher Tng. No 6 month surveillance 94/95/9701 and2000, 2002 1 each year
- 19. EDWIN STATNTON ELEMENTARY SCHOOL (K5) 1700 Christian St. Inspected 12/2/04. Met with Building Engineer Charles Camilari. There is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions of 12 removals 2 complete were on file ,but missing Waste Manifests. The other 10 had notifications only.) No copies of 1992 inspection. No records of Awareness Training No 6 Month Surveillance in 1994,1995, 1997,1998, 2001 in 2000, 2002 district only shows one each year,

WILLIAM P. MERIDETH ELEMENTARY SCHOOL (K-8) 725 S. 5TH St. Inspected 12/20/04 Met with PRINCIPAL STUART R. COOPERSTEIN. There is no copy of 10/4/03 Inspection at this site, But this principal had copies of everything ever given to him, copies of all inspections, complete response action files, posts the annual notification every year, his building engineer Henry Garcia has had refresher training Only 1 6 month surveillance in 2000 & none in 2001. This was one of the few Principals who got involved in the inspection, and knew his responsibilities under AHERA.

21. KEY ELEMENTARY SCHOOL (K-5) 2230 S 8th St. Inspected 12/13/04. Met with Building Engineer Alford A. Valle Jr. .There is no copy of 1992 or 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification.. No records of Awareness Training for custodians, nor refresher for all. No 6 month Surveillance in 1995,1997,1997,1998 or 2001 in 2000, 2002 only 1. Failed to perform a response action in timely manner- according to 94 inspection it was noted that 2"-6" pipe wrap in basement was damaged, also 9"x9" VAT on 3rd floor was damaged, both were given a high priority for removal or repair. This same remark was noted in 1997 inspection and the 2000 Inspection. The 2"-6" Pipe Insulation in the basement is still identified in the 2003 inspection again with higy priority to remove or repair.

- 22. PIERCE ELEMENTARY SCHOOL (K-5) 2300 w. Cambria St. Inspected 12/22/04.Met with Building Engineer Derik Savage There is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 1992, 1997, & original inspections. No records of Awareness Training. There are 6 custodians in Mr. Savage was accredited at Temple University as a building Inspector, no refresher 3 custodians under him not trained. No 6 mos. Surveillance in 1992,1994,1996,1997,1998, or 2001 in 2000, 2002 district only shows one each year.
- 23. FITZSIMONS MIDDLE SCHOOL (6-8) 2601 W. Cumberland St. Inspected 12/22/04. Met with Building Engineer Michael Clark. There is no copy of 1/18/04 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 1992, 1995, . No records of Awareness Training . No 6 mos Surveillance in 1992,1995,1997,1998, or 2001 in 2000, 2002, 2003 district only shows one each year.
- 24 DICK ELEMENTARY SCHOOL (K-7) 2498 W. Diamond St. Inspected 12/22/04. Met with Building Engineer Marcel Allen. There is no copy of 12/23/03 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 1992, 1995, .& original inspections. No records of Awareness Training for custodians, nor refresher for all. No 6 mos Surveillance in 1994,1995,1996,1997,1998 or 2001 in 2000, 2002 district only shows one each year.
- 25. WEBSTER ELEMENTARY SCHOOL (K-5) 3400 Frankford Ave. Inspected 1/12/05. Met with Building Engineer James Malkowski & Principal Alan Workman. There is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of original inspections. No records of Awareness Training for custodians, nor refresher for all. Mr Malkowski is trained worker but not current. No 6 mos Surveillance in 1994,1995,1996,1997,1998 or 2001 in 2000, 2002 district only shows one each year.
- 26 CLARA BARTON ELEMENTARY SCHOOL (K-4) 4600 Rosehill St. Inspected 1/12/05. Met with Mrs.Marie Pritchett Secretary and Principal Dr. William Lee. Neither had any idea what I was talking about when asked for proof of annual notification to parents and teachers and employees. Failed to maintain a complete file of response actions, there were a few copies of notifications, no air clearance, waste manifest, list of workers who did the response, and their proof of accreditation. Also no copies of the 6 month surveillance nor record of 2 hour awareness training, and refreshers for custodial and maintenance personnel. When asked Dr. Lee didn't know anything about their training.

- 27. LEA ELEMENTARY SCHOOL (K-8) 4700 Locust St. Inspected 1/13/05. Met with Building Engineer Barton Gurley .There is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. .Also missing copies of 2000 inspection.. No records of Awareness Training for custodians, nor refresher for all. Mr, gurley states he had original 13 years ago.. No 6 mos Surveillance in 1995,1997,1997,1998 or 2001 in 2000, 2002 district only
- 28. CAYUGA ELEMENTARY SCHOOL (K-4) 5th & Cayuga St. Inspected 1/19/05. Met with Secretary Ms. Judith Klein..There is no copy of 2Original inspection or 1992 & 2004 3 year inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions. Annual Notification Letter sent as a result of Inspection, but did not include data on any actions about Asbestos, also no reord of previous years letters. No record of Asbestos Awarenes ness Training for custodians, nor refresher for all.
- 29. MAYFAIR ELEMENTARY SCHOOL (K-8) 3001 Princeton Ave.. Inspected 1/19/05. Met with Building Engineer Frank R. Young. There is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. No records of Awareness Training for custodians, nor refresher for all.. No 6 mos Surveillance in 1995,1997,1997,1998 or 2001 in 2000, 2002 district only did one
- 39. DIMNER BEEBER MIDDLE SCHOOL (6-8) 5925 Malvern Ave. Inspected 1/20/05. Met with Building Engineer David Smith .There is no copy of 1992, 1997 nor 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. .No records of Awareness Training for custodians, nor refresher for all.No 6 month surveillance 95/97/98/01 & only one 2000 & 2003.
- 31. COMMUNITY EDUCATION PARTNERS/MILLER SCHOOL (Spec Ed.).. 4300 Westminister Ave. Inspected 1/20/05. Met with Asst. Principal of Operations, Mr. Kenneth Martin. He had no records of any kind on site, although he knew the building had been gutted and all asbestos allegedly removed. No records of any inspections, 6 mos surveillance, response actions, no copy of annual notifications nor records of training for custodial and maintenance personnel. Records reported in individual inspection report are from Environmental section for the School District.
- 32 OLNEY HIGH SCHOOL (9-12) 100 W DUNCANNON St. Inspected 2/9/05. Met with Building Engineer Payton Scott III. There is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 1992 inspection. No records of Awareness Training for custodians, nor refresher for all. No 6 month surveillance 1995/97/98/01 and only one in 2000/03

- 33. ETHAN ALLEN ELEMENTARY SCHOOL (K-8) 6329 Battersby St.. Inspected 2/93/05. Met with Principal James M. Serpiello. There is no copy of Original Inspection, 1992, or 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also no records of Awareness Training for custodians, nor refresher for all. No 6 mos Surveillance in 1995,1997,1998 or 2000 or 2001, and 2002 only one.
- 34. FREDERICK DOUGLAS ELEMENTARY SCHOOL (PK-6) 2118 W. Norris St. Inspected 2/16/05. Met with Building Engineer Anthony Greene. There is no copy of Original .1992 or2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 2000 inspection. No records of Awareness Training for custodians, nor refresher for all. Except Mr, Greene stated he had original about 10 years ago, and refresher last summer at JFK bldg... No 6 mos Surveillance in 1995,1997,1997,1998 or 2001 Only once each year 2000 * 2003.
- 35. STRAWBERRY MANSION JR.- SR HIGH SCHOOL (7-12) 3133 Ridge Ave.. Inspected 2/17/05. Met with Building Engineer William R. Brown there is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also there were no copies of 6 mos .surveillance and no records of Awareness Training for custodians, nor refresher for all. No 6 mos Surveillance in 1995,1997,1997,1998 or 2001 in 2000, 2002 one only
- 36. RANDOLPH SKILLS CENTER (ALT) Henry & Roberts Aves. Inspected 21/17/05. Met with Building Engineer Robert Talaga. There is no copy of 2003 inspection at this site. Also school failed to maintain records of 6 month surveillance, response actions and failed to send annual notification. Also missing copies of 2000 inspection.. No records of Awareness Training for custodians, nor refresher for all. Mr. Talaga Said he never had any of Asbestos Training, and he had notified the Environmental Section on many occasions that he needed training... No 6 mos Surveillance in 1995,1997,1997,1998 or 2001 in 2000, 2001 only one.

Harry & Boyer III

AHERA Inspector

Pesticide & Abestos Enforcement Programs Branch